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March 30, 2020

VIA ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *United States v. Daniel Rivera*, 19 Cr. 759 (CM)

Dear Judge McMahon:

I represent the defendant, Daniel Rivera, in the above referenced case, having been duly appointed pursuant to the Criminal Justice Act. This letter is respectfully submitted to request that the Court authorize the appointment of my associate, Chanel Sochacki, Esq., to assist me in representing Mr. Rivera in this matter.

In several recent cases, judges in this District have approved the appointment of an associate to assist me in multi-defendant cases in which there was a large amount of discovery and, often, complicated factual and legal issues. As with those cases, this one has presented me with the need for assistance from Ms. Sochacki. The discovery in this case includes NYPD reports and records, video recordings, and evidence seized as a result of an automobile stop and a parole search. These two incidents and subsequent searches were the subject of the defense suppression motions filed on January 24, 2020 – which required a significant amount of legal research and writing, as well as preparation meetings with Mr. Rivera. The hearing on the suppression motion is currently scheduled for April 22, 2020.

Ms. Sochacki has been appointed as an associate attorney in several cases in this district, including: *United States v. Martinez*, 17 Cr. 123 (LAP); *United States v. Lopez*, 16 Cr. 719 (RJS); *United States v. Gonzalez*, 15 Cr. 608 (KPF); *United States v. Gallicchio*, 17 Cr. 390 (ALC); *United States v. Melman*, 17 Cr. 350 (KBF); and *United States v. Griffin*, 18 Cr. 454 (KPF). Please accept this application at this time – I inadvertently failed to request Ms. Sochacki's appointment earlier. Ms. Sochacki has been instrumental in assisting me in legal research and will continue to assist me in preparing for Mr. Rivera's motion hearing and potential trial, especially during my physical absence from the office – in California – due to the current public health crisis related to COVID-19.

I am highly conscious of needlessly expending CJA funds. In this case I believe the appointment of my associate will actually result in a saving by relieving me of tasks that would

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be billed at a higher rate. I respectfully ask Your Honor to approve the appointment of Ms. Sochacki at a billing rate of \$90.00 per hour *nunc pro tunc* to September 18, 2019.

Very truly yours,

/s/ Irving Cohen
IRVING COHEN